

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

NEW HAMPSHIRE INDONESIAN
COMMUNITY SUPPORT, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, President of the United
States, in his official capacity, et al.,

Defendants.

Case No. 1:25-cv-38

**MOTION FOR THE ADMISSION, *PRO HAC VICE*, OF STEPHEN KANG
AS COUNSEL FOR PLAINTIFFS**

1. Pursuant to Rule 83.2(b) of the Local Rules of the United States District Court for the District of New Hampshire, New Hampshire Indonesian Community Support, League of United Latin American Citizens, and Make the Road New York (“Plaintiffs”) respectfully move this court for an order admitting Stephen Kang to the bar of this Court, *pro hac vice*, for the purpose of representing Plaintiffs in the above-captioned case. Mr. Kang is knowledgeable regarding the dispute between the parties, and it would be economical and efficient to allow Mr. Kang to appear before this Court.

2. Mr. Kang is a member in good standing of the bars of California, the U.S. Supreme Court, the U.S. District Court for the District of Columbia, the U.S. District Court for the Central District of California, the U.S. District Court for the Northern District of California, the U.S. District Court for the Southern District of California, the U.S. Court of Appeals for the District of Columbia Circuit, the U.S. Court of Appeals for the Third Circuit, the U.S. Court of Appeals for the Fifth Circuit, the U.S. Court of Appeals for the Sixth Circuit, and the U.S. Court of Appeals for the Ninth Circuit; he is not suspended or disbarred in any jurisdiction or involved in any

disciplinary proceedings; and he has never had *pro hac vice* status denied or revoked by any court. An affidavit attesting to these facts is attached.

3. For the foregoing reasons, Plaintiffs respectfully request that this Court grant this motion and enter an order for admission of Mr. Kang *pro hac vice* in the above-captioned case.

4. **Certificate of Concurrence**: Pursuant to Local Rule 7.1(c), undersigned counsel for Plaintiffs certify that Plaintiffs have made a good faith attempt to obtain concurrence in the relief sought. Plaintiffs sought concurrence on the evening of January 20, 2025 and had not yet obtained assent by the time of filing on the same date.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court:

A. Grant this Motion for Admission *Pro Hac Vice* of Stephen Kang; and

B. Grant such other and further relief as may be just and equitable.

Date: January 20, 2025

Respectfully submitted,

/s/ Gilles Bissonnette

Gilles R. Bissonnette (N.H. Bar No. 266657)

SangYeob Kim (N.H. Bar No. 266657)

Henry R. Klementowicz (N.H. Bar. No. 21177)

Chelsea Eddy (N.H. Bar No. 276248)

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AFFIDAVIT OF STEPHEN KANG

I, Stephen Kang, do hereby depose and swear as follows:

1. In accordance with Local Rule 83.2(b)(1)(A), I am an attorney at the American Civil Liberties Union Foundation, Inc. My office address is 425 California Street, 7th Floor, San Francisco, CA 94104. My email address is skang@aclu.org, and my telephone number is (415) 343-0783.

2. In accordance with LR 83.2(b)(1)(B), the following are the courts in which I am admitted to practice, along with the years and dates of my admission.

<u>Court</u>	<u>Date of Admission</u>	<u>Bar Number</u>
Supreme Court of California	December 4, 2013	292280
U.S. Supreme Court	January 13, 2020	
U.S. District Court for the District of Columbia	April 5, 2021	CA00090
U.S. District Court, Central District of California	May 22, 2014	292280
U.S. District Court, Northern District of California	August 11, 2017	292280
U.S District Court, Southern District of California	June 7, 2018	292280

U.S. Court of Appeals for the District of Columbia	January 15, 2020
U.S. Court of Appeals for the Third Circuit	May 4, 2016
U.S. Court of Appeals for the Fifth Circuit	October 16, 2014
U.S. Court of Appeals for the Sixth Circuit	December 26, 2019
U.S. Court of Appeals for the Ninth Circuit	July 7, 2015

3. In accordance with LR 83.2(b)(1)(C), I am a member in good standing and eligible to practice in the above-listed courts.

4. In accordance with LR 83.2(b)(1)(D), I am not currently and have never been suspended or disbarred in any jurisdiction.

5. In accordance with LR 83.2(b)(1)(E)(1), I have not been denied admission to practice before any court.

6. In accordance with LR 83.2(b)(1)(E)(2), I have not previously been disciplined by any court, nor am I subject to any pending disciplinary matters.

7. In accordance with LR 83.2(b)(1)(E)(3), I have not been convicted of any felony or misdemeanor crimes.

8. In accordance with LR 83.2(b)(1)(F), I have not been denied admission to practice before any court, and no court has denied or revoked my pro hac vice status.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Date: January 20, 2025

Respectfully submitted,

/s/ Stephen Kang

Stephen Kang

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FOUNDATION

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